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**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

BANK OF AMERICA, N.A.,

Plaintiff,

v.

WEST SAHARA COMMUNITY  
ASSOCIATION; ALEX BEREZOVSKY,  
INDIVIDUAL AND AS TRUSTEE OF THE  
ABER TRUST; NOESIS ESTATE  
MANAGEMENT LLC; and ATC  
ASSESSMENT COLLECTION GROUP, LLC,

Defendants.

NOESIS ESTATE MANAGEMENT, LLC, a  
Nevada limited liability company,

Counterclaimant,

v.

BANK OF AMERICA, N.A.; JASON L. SNOW,  
an individual; and any and all other person  
unknown claiming any right, title, estate, lien, or  
interest in the Property adverse to the Plaintiff's  
ownership, or any cloud upon Plaintiff's title  
thereto; DOES 1 through 10, inclusive,

Counter-defendants,

Case No.: 2:16-cv-00500-RFB-BNW

**JOINT STIPULATION TO  
COORDINATE SUMMARY JUDGMENT  
DEADLINES**

**[FIRST REQUEST]**

Pursuant to Federal Rule of Civil Procedure 6(b) and District of Nevada Local Rule IA 6-1,  
Bank of America, N.A. (**BANA**), West Sahara Community Association (**HOA**), and Noesis Estate  
Management LLC (**Noesis**) jointly agree and request the court coordinate all outstanding summary  
judgment deadlines with respect to BANA's summary judgment motion and Noesis's counter-motion  
for summary judgment. (ECF Nos. 65, 70.)

1 BANA filed a summary judgment motion on May 14, 2020. (ECF No. 65.) The HOA  
 2 responded to BANA's summary judgment motion on June 5, 2020. (ECF No. 68.) The court set  
 3 BANA's reply deadline as June 19, 2020. (ECF No. 68, minutes) The court extended Noesis's  
 4 deadline to respond to BANA's summary judgment to June 8, 2020. (ECF No. 67.) Noesis  
 5 responded to BANA's summary judgment motion on June 8, 2020. (ECF No. 69.) The court set  
 6 BANA's reply deadline as June 22, 2020. (ECF No. 69, minutes) Noesis also countermoved for  
 7 summary judgment on June 8, 2020 (ECF No. 70.) The court set BANA's opposition deadline as  
 8 June 29, 2020. (ECF No. 69, minutes)

9 BANA's reply and opposition deadlines are spread out over various dates in June 2020: June  
 10 19, June 22, and June 29. (ECF Nos. 68-70, minutes.) In an effort to coordinate briefing, BANA  
 11 desires to to file a reply supporting summary judgment and an opposition to Noesis's countermotion  
 12 on June 29, 2020. This is the parties' first request to extend these deadlines and is warranted to  
 13 coordinate briefing schedules and avoid three separate briefs.

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This extension is not requested for purposes of undue delay and will not prejudice any party.

Dated this 9th day of June, 2020.

**AKERMAN LLP**

/s/ Scott R. Lachman

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**COURT APPROVAL**

IT IS SO ORDERED.

  
\_\_\_\_\_  
RICHARD F. BOULWARE, II  
UNITED STATES DISTRICT JUDGE

DATED this 10th day of June, 2020.

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